

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
AARON EUBANKS	:	VIOLATIONS:
	:	18 U.S.C. § 1029(b)(2) (conspiracy to
	:	commit access device fraud - 1 count)
	:	18 U.S.C. § 1029(a)(2) (unauthorized
	:	access devices - 1 count)
	:	18 U.S.C. § 1028A(a)(1) (aggravated
	:	identity theft - 1 count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

Prepaid

1. Prepaid Legal Services, Inc. ("Prepaid"), in Ada, Oklahoma, provided legal service plans to its members.
2. The members paid Prepaid for the plans by providing Prepaid a credit/debit card account number, which Prepaid billed on a monthly basis.
3. Representatives of Prepaid solicited the public on behalf of Prepaid in order to obtain new members and submitted to Prepaid member applications, with the members' credit/debit account numbers.
4. Prepaid paid its representatives commissions for the members that the

representatives successfully solicited.

Liberty

5. Liberty Benefits (“Liberty”), in Ardmore, Oklahoma, provided discount medical programs, as an alternative to health care plans, to its members.

6. The members paid Liberty for the plans by providing Liberty a credit/debit card account number, which Liberty billed on a monthly basis.

7. Representatives of Liberty solicited the public on behalf of Liberty in order to obtain new members and submitted to Liberty member applications, with the members’ credit/debit account numbers.

8. Liberty paid its representatives commissions for the members that the representatives successfully solicited.

Everyday Wealth

9. Everyday Wealth, in Austin, Texas, provided consumer finance services to assist its members in managing and protecting their finances.

10. The members paid Everyday Wealth for the plans by providing Everyday Wealth a credit/debit card account number, which Everyday Wealth billed on a monthly basis.

11. Representatives of Everyday Wealth solicited the public on behalf of Everyday Wealth in order to obtain new members and submitted to Everyday Wealth member applications, with the members’ credit/debit account numbers.

12. Everyday Wealth paid its representatives commissions for the members that the representatives successfully solicited.

13. From at least in or about January 2004, to in or about October 2004, in

Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

AARON EUBANKS

conspired and agreed with others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to knowingly and with intent to defraud, use one or more unauthorized access devices during any one-year period, and by such conduct obtain anything of value aggregating \$1,000 or more during that period, in violation of Title 18, United States Code, Section 1029(a)(2).

MANNER AND MEANS

It was part of the conspiracy that:

14. Defendant AARON EUBANKS became a representative of Prepaid.

15. Defendant AARON EUBANKS, using false names, also manufactured fraudulent phantom people to serve as representatives for Prepaid, Liberty, and Everyday Wealth.

16. Defendant AARON EUBANKS used the representative accounts in his name and in the fictitious names of his phantoms to get Prepaid, Liberty, and Everyday Wealth to pay him and another person known to the United States Attorney commissions on fraudulently opened member accounts.

17. When creating these representative accounts at Prepaid, Liberty and Everyday Wealth, defendant AARON EUBANKS provided Prepaid, Liberty and Everyday Wealth bank account numbers for accounts in the name of defendant AARON EUBANKS and in the name of another person known to the United States Attorney, for the payment of the commissions.

18. Another person known to the United States Attorney stole credit/debit card

account numbers.

19. Another person known to the United States Attorney gave the stolen credit/debit card account numbers to defendant AARON EUBANKS for defendant AARON EUBANKS to use to submit fraudulent member applications to Prepaid, Liberty and Everyday Wealth.

20. Defendant AARON EUBANKS submitted fraudulent member applications to Prepaid, Liberty and Everyday Wealth, using the unauthorized account numbers provided by another person known to the United States Attorney.

21. Prepaid, Liberty and Everyday Wealth paid commissions for the creation of the fraudulent member accounts, often by directly depositing commission payments into the bank accounts of defendant AARON EUBANKS and another person known to the United States Attorney.

22. By operation of this scheme, defendant AARON EUBANKS generated fraudulent commissions of over \$20,800 while causing victims to be falsely billed thousands of dollars.

OVERT ACTS

In furtherance of the conspiracy, defendant AARON EUBANKS and others known and unknown to the United States Attorney, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about January 21, 2004, defendant AARON EUBANKS applied to be a representative of Prepaid under the fictitious name "T.S.," providing Prepaid a PNC Bank account number for an account in the name of another person known to the United States

Attorney.

2. On or about February 6, 2004, defendant AARON EUBANKS, using the fictitious name “T.S.,” submitted to Prepaid a fraudulent member application in the name of “A.B.,” with an unauthorized American Express credit card account number ending in the numbers 1003.

3. As a result of the “A.B.” member application, Prepaid charged the American Express credit card account number ending in the numbers 1003 monthly fees of approximately \$45.95 in or about February 2004 and March 2004.

4. As a result of the “A.B.” member application, in or about February 2004, Prepaid paid a commission by depositing the commission payment into the PNC Bank account of another person known to the United States Attorney.

5. On or about February 27, 2004, defendant AARON EUBANKS applied to be a representative of Prepaid under the fictitious name “T.R.,” providing Prepaid a Citizens Bank account number for an account in the name of defendant AARON EUBANKS.

6. On or about March 8, 2004, defendant AARON EUBANKS, using the fictitious name “T.R.,” submitted to Prepaid a fraudulent member application in the name of “E.W.,” with an unauthorized JP Morgan/Bank One Visa credit card account number ending in the numbers 3313.

7. As a result of the “E.W.” member application, Prepaid charged the JP Morgan/Bank One Visa credit card account number ending in the numbers 3313 an initial fee of approximately \$45.95 in or about March 2004 and monthly fees of approximately \$35.95 from in or about April 2004 to in or about September 2004.

8. As a result of the “E.W.” member application, in or about March 2004, Prepaid paid defendant AARON EUBANKS a commission by depositing the commission payment into defendant AARON EUBANKS’ Citizens Bank account.

All in violation of Title 18, United States Code, Section 1029(b)(2).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From in or about January 2004 to in or about October 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

AARON EUBANKS

knowingly and with the intent to defraud used, attempted to use, and aided and abetted and willfully caused the use of, one or more unauthorized access devices, including, but not limited to, American Express credit card account number ending in the numbers 1003, in the name of “A.B.,” and JP Morgan/Bank One Visa credit card account number ending in the numbers 3313, in the name of “E.W.,” to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of over approximately \$20,700, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and 2.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about March 8, 2004, in the Eastern District of Pennsylvania, and
elsewhere, defendant

AARON EUBANKS

knowingly and without lawful authority possessed and aided and abetted and willfully caused the possession of a means of identification of another person, that is, the name of “E.W.,” during and in relation to credit card fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(4) and 2.

PATRICK L. MEEHAN
UNITED STATES ATTORNEY